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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

November 14, 2019

Colonel Robert A. Masaitis
Commander, 27th Special Operations Wing
100 Air Commando Way, Suite 100
Cannon Air Force Base
New Mexico 88103-5214

**RE: DISAPPROVAL
ACCELERATED CORRECTIVE MEASURES
COMPLETION REPORT SITE SW127 REVISION 1
CANNON AIR FORCE BASE, NEW MEXICO
EPA ID #NM7572124454
HWB-CAFB-17-010**

Dear Col. Masaitis:

The New Mexico Environment Department (NMED) is in receipt of the Cannon Air Force Base (Permittee) *Accelerated Corrective Measures Completion Report Site SW127 [Solid Waste Management Unit (SWMU) 127] Revision 1* (Report), dated March 11, 2019. NMED has reviewed the Report and hereby issues this Disapproval. The following comments must be addressed.

GENERAL COMMENTS

1. Risk Screen Evaluation Discrepancies

NMED Comment: The following issues and discrepancies associated with the risk screen evaluation must be addressed as follows:

- a. The Permittee's response to Comment No. 1 of NMED's October 25, 2018 *Disapproval Accelerated Corrective Measures Completion Report Site SW127*

(Disapproval) pertaining to inconsistencies in the use of thallium maximum concentrations used for the risk screen evaluation indicates Section 4.4.2, Comparison of Site Inorganics to Background and Section 4.4.5, Evaluation of Lead, were revised to reflect the changes to the risk screen evaluation data set and indicated that the data set utilized for risk screen evaluation was updated to include previously omitted sample data and the deletion of a duplicate sample not intended for use as a site characterization sample. The data set updates have affected the maximum concentration for thallium and various other constituents of potential concern (COPCs) including lead. NMED's review indicates Section 4.4.2 was revised; however, no changes were noted for Section 4.4.5. The revised Report must include the changes to Section 4.4.5 based on the data set updates. Revise the Report accordingly.

- b. Section 4.4.7, Refined Quantitative Risk Screening Evaluation for Soil, states that "the 95% Upper Confidence Limit (UCL) was estimated for all chemicals with a minimum of eight samples and six detections using USEPA's statistical software ProUCL, Version 5.1.00." However, Appendix E, Human Health Risk Assessment, Tables E-14 and E-15 notes indicate that UCLs were only calculated for chemicals with a minimum of eight detections. Attachment E.1 data reports indicate a 95% UCL was calculated for thallium. Report table information and the ProUCL data report indicate thallium was detected in seven out of forty-eight samples. The 95% UCL concentration for thallium was not listed in Section 4.4.7, nor does it appear to have been used in the refined risk screen evaluation. Review the refined risk screen evaluation and ensure the methodology for calculation and use of UCLs as exposure point concentrations for COPCs has been consistently applied and meets the minimum requirements outlined in NMED's *Risk Assessment Guidance for Site Investigations and Remediation* (RA Guidance) (Section 2.8.4.1, Discrete Data). Revise the Report accordingly.
- c. The Permittee's response to Disapproval Comment No. 2 addressing discrepancies in the maximum concentrations for cobalt and manganese states "[t]he maximum in Table E-6 [Comparison of Maximum Detected Surface Soil (0 to 1 Foot bgs) Metal Concentrations at SW127 to Background UTLs] were determined by ProUCL and are provided in the attached supporting information (Attachment E.1)." However, the actual maximum concentrations listed in Table E-6 for COPCs, including cobalt and manganese, correspond to maximum concentrations listed on Table E-2, Summary of Surface Soil (0 to 1 Foot bgs) Analytical Results at SW127. Table E-6 notes also indicate the maximum soil concentrations are the identified maximum concentrations from Table E-2. Clarify the actual source of the maximum concentrations listed on Table E-6 in the response to NMED comments and ensure that the maximum concentrations used during risk evaluation for all COPCs are

correct and accurately referenced throughout the revised Report and the response to NMED comments. Revise the Report accordingly.

- d. The Permittee's response to NMED Disapproval Comment 2c addressing issues pertaining to maximum soil concentrations for cobalt and manganese on Table E-5 states "[t]able E-6 is the background comparison for subsurface soils". However, Table E-6 presents the background comparison for surface soils. Address the Permittee response to NMED comment discrepancy in the response to NMED comment for the revised Report. Clarify the correct table reference for the subsurface background evaluation in the response to comments. Ensure that all table references are accurately cited in the revised Report as well as the Permittee's response to NMED comments matrix. Revise the Report accordingly.
- e. Table E-5, Comparison of Maximum Detected Subsurface Soil (1 to 10 feet bgs) Metals Concentrations at SW127, references Attachment E.1 as the source of maximum concentration data for COPCs. However, the maximum concentrations for cobalt (5.2 milligrams per kilogram (mg/kg)) and manganese (218 mg/kg) and other metals appear to actually be derived from Table E-1, Summary of Mixed Zone Soil (0 to 10 feet bgs) Results at SW127. Revise the Table E-5 notes to accurately cite the source of maximum concentrations used for the subsurface soil background evaluation. Revise the Report accordingly.

SPECIFIC COMMENTS

2. Section 2.2, SW127 (SWMU [Solid Waste Management Unit] 127) Description and Background, Page 2-7

Permittee Statement: "Historical data was compared to current (2017) NMED residential SSLs [Soil Screening Levels] to allow for identification of contamination in excess of current residential SSLs."

NMED Comment: The Section 4.3, Human Health Screening-Level Evaluation Methodology, indicates 2019 NMED SSLs were used for the screening level evaluation documented in the Report. Update the statement in the revised Report to accurately reflect the actual SSLs used for the screening level evaluation.

3. Table 2-1, 1993 Phase I RFI Soil Sampling Analytical Results

NMED Comment: The NMED residential and soil-to-groundwater SSLs for 1,2-dichloroethane (total) listed on Table 2-1 do not correspond to NMED's current SSLs for the chemical of concern (COC). Update the SSLs and ensure that all screening levels used for evaluation of COCs and COPCs are accurate or clarify and reference the source of listed

SSLs. Revise the Report accordingly.

4. Table 2-2, 1994 Phase II RFI Soil Sampling Analytical Results

NMED Comment: NMED's June 2019 update to the RA Guidance includes SSLs for human health receptors for naphthalene. Revise the screening level and risk evaluations to include the updated SSLs for naphthalene.

5. Table 2-5, 2014 Risk Screening Evaluation Soil Gas Sampling Analytical Results

NMED Comment: The following Table 2-5 issues were identified and must be addressed as follows:

- a. A typographical error (5-Feb) was noted for the soil gas concentration reported for sample 127-SV01-05 for benzene. Revise the table to include a concentration for benzene for the sample. Revise the Report accordingly.
- b. The reported maximum concentration for benzene (4.35E+04 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$)) is incorrect. The correct maximum concentration for benzene is 6.70E+00 $\mu\text{g}/\text{m}^3$. Update the table to include the correct maximum concentration for benzene. Revise the Report accordingly.

6. Section 3.1.1, Ground Penetrating Radar Survey [GPR], Page 3-1

NMED Comment: The following outstanding issues for Section 3.1.1 regarding the GPR survey must be addressed as follows:

- a. Appropriately cite the report documenting the GPR survey at Solid Waste Management Unit 127 in the section and provide a corresponding document reference entry in Section 6, References. Appendix H, GPR Survey Maps figure numbers (i.e., Figures 11, 12, 13, and 14) indicate that the GPR data was sourced from a separate report based on the absence of survey data Figures 1 through 10. As previously required, provide the complete report as a separate reference document with the revised Report. NMED will add the report to the Facility administrative record. Revise the Report accordingly.
- b. The Permittee response to NMED's Disapproval Comment No. 11 pertaining to NMED identified GPR survey data gaps states "[t]he sand trap was removed in 2003 and was not included in the area surveyed". Clarify the exact location of the removed sand trap in the revised Report and any supporting figure information. If this information is not currently available, then the revised Report recommendations must also propose additional investigation that identifies the

exact location of the removed sand trap and ensures that the location has been adequately sampled. Revise the Report accordingly.

7. Table 3-1, Waste Characterization Sampling Analytical Data

NMED Comment: The waste characterization sample results for total petroleum hydrocarbons (TPH) Gasoline Range Organics (GRO), Diesel Range Organics (DR), and Oil Range Organics (ORO) were not included on the table. The table must include all waste characterization sample concentration results for TPH GRO, DRO, and ORO. Revise the Report accordingly.

8. Section 4.4.2, Comparison of Site Inorganics to Background, Page 4-9

NMED Comment: The maximum concentration for iron ($1.34E+04$ mg/kg) listed in the section information for surface soils does not match the maximum concentration reported on Tables E-2 or E-6 ($1.30E+04$ mg/kg). Correct the discrepancy in the revised Report.

9. Section 4.4.4, Quantitative Risk Screening Evaluation, Page 4-10

Permittee Statement: "A quantitative screening evaluation was completed in accordance with the 2017 NMED risk assessment guidance (See Section 4.3 for methodology)."

NMED Comment: The Section 4.3 discussion cites NMED's 2019 RA Guidance as the guidance document for the SWMU 127 COPC evaluation. The statement must be revised to cite the correct RA Guidance document used for the risk assessment. Revise the Report accordingly.

10. Section 4.4.5, Evaluation of Lead, Page 4-11

Permittee Statement: "Lead concentrations were determined to be within background levels. Additionally, the maximum detected concentration of lead ($1.26E+01$ mg/kg) did not exceed the residential SSL of $4.00E+02$ mg/kg nor the site worker SSL of $8.00E+02$ mg/kg (Appendix E, Tables E-7 and E-8)."

NMED Comment: The maximum detected concentration for lead is $2.08E+01$ mg/kg. Revise the statement to cite the correct maximum concentration for lead.

11. Section 4.5, Soil-to-Groundwater Evaluation, Pages 4-15 through 4-16

NMED Comment: Issues with the Section 4.5 soil-to-groundwater evaluation were identified and must be addressed as follows:

- a. The Permittee's response to Disapproval Comment 19 indicated that a thallium evaluation had been added to Section 4.5. However, the section did not include the thallium evaluation. The maximum concentration of thallium ($2.00E-01$ mg/kg) has exceeded the background UTL for subsurface soil ($1.72E-01$ mg/kg). Section 4.5 must be revised to include a thallium evaluation. Supporting lines of evidence must be provided in the discussion to support the Permittee's conclusion that thallium concentrations are representative of background and that the soil-to-groundwater pathway is incomplete for the COPC. Revise the Report accordingly.
- b. The soil-to-groundwater pathway discussion for metals interaction with soil and metals retention capacity of soil was added to the bulleted lines of evidence presented in Section 4.5. However, the metals interaction with soil line of evidence is not specific to soils at SWMU 127 or CAFB. The section discussion must be expanded to address the interaction of metals and soil as well as the metals retention capacity of soils specific to SWMU 127 and CAFB. Appropriate reference to documents, studies, reports, and/or supporting data must be cited in the revised discussion and referenced in Section 6.0 of the revised Report. If not previously submitted to NMED, all supporting reference documents and/or data must be provided to NMED with the revised Report for addition to the Facility administrative record. Revise the Report accordingly.

12. Section 4.6, Site Conceptual Exposure Model, Pages 4-17 through 4-18

NMED Comment: The following Section 4.6 issues must be addressed as follows:

- a. The section discussion states "[t]he hazard indices [HI] ranged from 0.14 for site worker to 2.6 for residents." Table E-9, Human Health Quantitative Screening Evaluation Results for SW127 Residential Scenario-Mixed Zone, indicates that the HI for the residential exposure scenario is 2.2. Ensure that the correct HI is cited in the revised section discussion. Revise the Report accordingly.
- b. The refined risk evaluation section discussion states "[t]he construction worker HI was estimated at 1.2. The residential HI was estimated at 1.4" However, the refined HIs for the construction worker and resident reported on Tables 4-6, E-14, E-15, and E-16 are 1.1 for the construction worker and 1.3 for residents. Correct the discrepancy and ensure that all risk and hazard calculation results are accurately reported in the revised Report. Revise the Report accordingly.

13. Table 4-9, Risk Screening Evaluation of 2014 Soil Gas Sampling Analytical Results 5-Foot Depth

NMED Comment: A soil vapor sample concentration typographical error (i.e., 2014 Risk) was noted for sample 127-SV10-05 for trichlorethylene (TCE). Revise the table to include a concentration for TCE for the sample. Revise the Report accordingly.

14. Table 4-11, Estimated Cancer Risk and Hazard for Residents from Soil Gas Concentrations at SW127

NMED Comment: The following Table 4-11 issues were identified and must be addressed as follows:

- a. A maximum TCE soil gas concentration of $280 \mu\text{g}/\text{m}^3$ for 5-feet bgs was reported on Table 4-11. However, Attachment E.3 Johnson and Ettinger (JE) risk calculation data reports indicate that the 10-foot bgs maximum soil gas concentration $920 \mu\text{g}/\text{m}^3$ was used to calculate risk and hazard at 5-feet bgs for TCE. Review the vapor intrusion (VI) risk evaluation and ensure that respective exposure interval maximum concentration data is used for calculation of risk and hazard for each COPC. Revise the Report accordingly.
- b. A maximum vinyl acetate soil gas concentration of $33 \mu\text{g}/\text{m}^3$ was reported on Table 4-11 for the 10-foot bgs exposure interval. However, Attachment E.3 data reports indicate that the maximum soil gas concentration ($44 \mu\text{g}/\text{m}^3$) at 5-feet bgs was used for calculation of hazard at 10-foot bgs for vinyl acetate. Review the VI risk evaluation and ensure that respective exposure interval maximum concentration data is used for calculation of risk and hazard for each COPC. Revise the Report accordingly.
- c. A maximum cancer risk of $1.07\text{E}-08$ and hazard of 0.00012 for 10-foot bgs were selected for benzene for the VI cumulative risk screen evaluation. However, the calculated benzene cancer risk ($1.21\text{E}-08$) and hazard (0.00014) at 5-feet bgs are the maximum risk and hazard and must be used to calculate total cancer risk and hazard for residents. Revise the Report accordingly.
- d. A maximum cancer risk of $1.11\text{E}-09$ and hazard of 0.00029 for 10-foot bgs were selected for PCE for the VI cumulative risk screen evaluation. However, the calculated cancer risk of $2.01\text{E}-09$ and hazard of 0.00052 at 5 feet bgs are the maximum risk and hazard and must be used to calculate total risk and hazard for residents. Revise the Report accordingly.

- e. A maximum cancer risk of 8.85E-07 and hazard of 0.203 for 10-foot bgs were selected for TCE for the VI cumulative risk screen evaluation. However, the calculated cancer risk of 1.80E-06 and hazard 0.412 at 5-foot bgs are the maximum cancer risk and hazard and must be used to calculate total risk and hazard for residents. Revise the Report accordingly.
- f. A maximum hazard of 0.000022 at 5-foot bgs was selected for m,p-xylene to calculate total hazard for the VI cumulative risk screen evaluation. However, 0.000097 calculated for the 10-foot bgs exposure interval is the maximum hazard and must be used to calculate total hazard for residents. Revise the Report accordingly.
- g. A maximum hazard of 0.000049 for 10-foot bgs was selected for o-xylene to calculate total hazard for the VI cumulative risk screen evaluation. However, 0.00009 calculated for the 5-foot bgs exposure interval is the maximum hazard and must be used to calculate total hazard for residents. Revise the Report accordingly.
- h. A maximum hazard of 0.0000084 for 10-foot bgs was selected for methyl ethyl ketone to calculate hazard for the VI cumulative risk screen evaluation. However, 0.000011 calculated for the 5-foot bgs exposure interval is the maximum hazard and must be used to calculate total hazard for residents. Revise the Report accordingly.

15. Table 4-12, Estimated Cancer Risk and Hazard for Site Workers from Soil Gas Concentrations at SW127

NMED Comment: The following Table 4-12 issues were identified and must be addressed as follows:

- a. A maximum TCE soil gas concentration of 280 $\mu\text{g}/\text{m}^3$ for 5-foot bgs was reported on Table 4-12. However, Attachment E.3 data reports indicate that the 10-foot bgs maximum soil gas concentration of 920 $\mu\text{g}/\text{m}^3$ was used to calculate risk and hazard at 5-foot bgs for TCE. Review the VI risk evaluation and ensure that respective exposure interval maximum concentration data is used for calculation of risk and hazard for each COPC. Revise the Report accordingly.
- b. A maximum vinyl acetate soil gas concentration of 33 $\mu\text{g}/\text{m}^3$ was reported on Table 4-12 for the 10-foot bgs exposure interval. However, Attachment E.3 data reports indicate that the maximum soil gas concentration (44 $\mu\text{g}/\text{m}^3$) at 5-foot bgs was used for calculation of hazard at 10-foot bgs for vinyl acetate. Review the VI risk evaluation and ensure that respective exposure interval maximum concentration data is used for calculation of risk and hazard for each COPC. Revise the Report accordingly.

- c. A cancer risk of $3.25E-07$ is reported for TCE at 5-foot bgs. However, Attachment E.3 data reports indicate that $2.49E-07$ is the calculated cancer risk for TCE at 5-foot bgs. Ensure the reported calculated cancer risk at 5-foot bgs is correct and revise Table 4-12 accordingly. Additionally, revise any affected sections of the Report accordingly.

16. Appendix E, Human Health Risk Assessment

NMED Comment: All Appendix E tables and risk analysis reports and attachments must be included in the hard copy of the revised Report. Ensure that all data is accurate, complete, and readily reviewable. Revise the Report accordingly.

17. Table E-7, Comparison of Maximum Detected Concentrations at SW127 To Screening Criteria- Mixed Zone Soil (0 to 10-Foot Exposure Interval)

NMED Comment: The following Table E-7 issues were identified and must be addressed as follows:

- a. A discrepancy in the residential SSL for 2-butanone ($3.73E+04$ mg/kg) was noted. The correct NMED residential SSL is $3.74E+04$ mg/kg. Correct the discrepancy in the revised Report and ensure that the correct screen level is used for the risk screen evaluation.
- b. The most conservative SSL for butyl benzyl phthalate is the calculated residential cancer SSL ($2.80E+03$ mg/kg) documented on Table E-17a, Calculation of Residential SSLs. The screening level evaluation for butyl benzyl phthalate must be conducted with the most conservative residential SSL. Revise the Report accordingly.
- c. Two detections out of thirty-one samples were reported for diethyl phthalate; however, only one detection result ($4.30E-02$ mg/kg for sample CAN127-2714-0005) was identified on Table E-1. The maximum concentration used for risk evaluation appears to be a reporting limit ($3.70E-01$ mg/kg). Resolve the apparent discrepancy or clarify the rationale for use of a reporting limit as the maximum concentration for diethyl phthalate for the screening level evaluation. Revise the Report accordingly.

18. Table E-8, Comparison of Maximum Detected Concentrations at SW127 To Screening Criteria- Surface Soil (0 to 1-Foot Exposure Interval)

NMED Comment: A discrepancy in the residential SSL for iron ($5.40E+04$ mg/kg) was noted on the table. The correct NMED residential SSL is $5.48E+04$ mg/kg. Correct the discrepancy in the revised Report.

19. Table E-9, Human Health Quantitative Screening Evaluation Results for SW127 Residential Scenario-Mixed Zone Soil

NMED Comment: Residential cancer ($4.97E+01$ mg/kg) and noncancer ($1.62E+02$ mg/kg) SSLs are provided for naphthalene in the updated June 2019 RA Guidance. The updated SSLs must be used for the risk screen evaluation in the revised Report. Revise the Report accordingly.

20. Table E-10, Human Health Quantitative Screening Evaluation Results for SW127 Construction Worker Scenario-Mixed Zone Soil

NMED Comment: The following Table E-10 issues were identified and must be addressed as follows:

- a. The June 2019 update to the RA Guidance includes a construction worker noncancer SSL ($1.50E+01$ mg/kg) for benzo(a)pyrene. Ensure that updated SSLs for benzo(a)pyrene are used for the risk screen evaluation. Revise the Report accordingly.
- b. The construction worker cancer ($9.25E+04$ mg/kg) and noncancer ($5.02E+04$ mg/kg) SSLs for butyl benzyl phthalate do not match the calculated cancer ($9.91E+04$ mg/kg) and noncancer ($5.38E+04$ mg/kg) SSLs documented on Table E-17c, Calculation of Construction Worker SSLs. Provide the source of the screening levels on the table or update Table E-17c to include any updated SSL calculations. Revise the Report accordingly.
- c. The construction worker noncancer SSL for di-n-octyl phthalate ($2.51E+03$ mg/kg) does not match the calculated noncancer SSL ($2.69E+03$ mg/kg) documented on Table E-17c. Provide the source of the screening level on the table or update Table E-17c to include any updated SSL calculations. Revise the Report accordingly.
- d. June 2019 updates to the RA Guidance include a naphthalene cancer ($1.11E+03$ mg/kg) and noncancer ($1.59E+02$ mg/kg) SSL for the construction worker exposure scenario. The risk evaluation must be revised to include the updated SSLs. Revise the Report accordingly.

21. Table E-11, Human Health Quantitative Screening Evaluation Results for SW127 Commercial/Industrial Worker Scenario-Surface Soil

NMED Comment: June 2019 updates to the RA Guidance include commercial/industrial cancer ($2.41E+02$ mg/kg) and noncancer ($8.43E+02$ mg/kg) SSLs for naphthalene. Update the commercial/industrial risk screen evaluation to include the updated SSLs. Revise the

Report accordingly.

22. Table E-14, Human Health Quantitative Screening Evaluation Results for SW127 Residential Scenario Mixed Zone Soil-95% UCL

NMED Comment: The following Table E-14 issues were identified and must be addressed as follows:

- a. The maximum concentration for diethyl phthalate ($4.30E-2$ mg/kg) for residents does not correspond to the maximum concentration listed on Tables E-1 and E-9 ($3.70E-01$ mg/kg). Review all concentration data for diethyl phthalate and ensure all sample detections are accounted for and that the maximum concentration used for the risk evaluation is accurate. Revise the Report accordingly.
- b. Residential cancer ($4.97E+01$ mg/kg) and noncancer ($1.62E+02$ mg/kg) SSLs are provided for naphthalene in the updated June 2019 RA Guidance. The updated SSLs must be used for risk screen evaluation in the revised Report. Revise the Report accordingly.

23. Table E-15, Human Health Quantitative Screening Evaluation Results for SW127 Construction Worker Scenario-Mixed Zone Soil

NMED Comment: The following Table E-15 issues were identified and must be addressed in the revised Report as follows:

- a. The June 2019 update to the RA Guidance includes a construction worker noncancer SSL ($1.50E+01$ mg/kg) for benzo(a)pyrene. Ensure that updated SSLs for benzo(a)pyrene are used for the risk screen evaluation. Revise the Report accordingly.
- b. The construction worker cancer ($9.25E+04$ mg/kg) and noncancer ($5.02E+04$ mg/kg) SSLs for butyl benzyl phthalate do not match the calculated cancer ($9.91E+04$ mg/kg) and noncancer ($5.38E+04$ mg/kg) SSLs documented on Table E-17c, Calculation of Construction Worker SSLs. Provide the source of the screening levels on the table or update Table E-17c to include any updated SSL calculations. Revise the Report accordingly.
- c. The construction worker noncancer SSL for di-n-octyl phthalate ($2.51E+03$ mg/kg) does not match the calculated noncancer SSL ($2.69E+03$ mg/kg) documented on Table E-17c. Provide the source of the screening level on the table or update Table E-17c to include any updated SSL calculations. Revise the Report accordingly.

- d. June 2019 updates to the RA Guidance include a naphthalene cancer ($1.11E+03$ mg/kg) and noncancer ($1.59E+02$ mg/kg) SSL for the construction worker exposure scenario. The risk evaluation must be revised to include the updated SSLs. Revise the Report accordingly.

The Permittee must submit a revised Report that addresses all comments contained in this Disapproval. In addition, the Permittee must include a response letter that cross-references where NMED's numbered comments were addressed. The Permittee must also submit an electronic redline-strikeout version of the revised Report showing where all changes have been made to the Report. The revised Report must be submitted on or before **February 28, 2020**.

If you have any questions regarding this letter, please contact Gabriel Acevedo at (505) 476-6043.

Sincerely,



Dave Cobrain
Program Manger
Hazardous Waste Bureau

cc: B. Wear, NMED HWB
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